

# **EXHIBIT N**



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By Email to: LCasaria@sheppardmullin.com

March 20, 2019

Leo D. Caseria, Esq.  
Sheppard Mullin Richter & Hampton, LLP  
333 S. Hope St., 43rd Floor  
Los Angeles, CA 90071

**Re: Defendants' Notice of Issuance of Subpoena to Testify at a Deposition to Non-Party Dominion Enterprises, Inc., MDL No. 2817, Case No. 18 C 864**

Dear Mr. Caseria

As you are aware, we represent Dominion Enterprises, Inc. ("Dominion") in connection with the above-referenced litigation. We write in response to the subpoena to testify at a deposition to non-party Dominion Enterprises, Inc. received on February 26, 2019. Dominion wishes to preserve its rights under the Federal Rules of Civil Procedure by asserting its objection to the Subpoena.

The deposition was set for April 15, 2019. You indicated to me that this was just a placeholder. Nevertheless, Dominion objects to the date of the deposition. As you are well aware, Dominion has objected to the treatment of its confidential materials under the current Confidentiality Order ("Order"). Judge Dow is currently considering Dominion's objections to that Order. Judge Dow indicated that he would issue an opinion on Dominion's objections in April, but unfortunately, we do not now when in April, or if he may push that date back. Accordingly, Dominion will not appear for a deposition until Dominion's objections to the Order have finally been decided.

Sincerely,

*Marc G. Schildkraut* /s/

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